

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**VIDEOSHARE, LLC,**

**Plaintiff,**

**v.**

**GOOGLE LLC and  
YOUTUBE, LLC,**

**Defendants.**

**CIVIL ACTION NO. 6:19-CV-00663-ADA**

**JURY TRIAL DEMANDED**

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**STIPULATED MOTION TO WITHDRAW FOR JUST CAUSE BY MICHAEL SHORE,  
AND HALIMA SHUKRI NDAI AND THE SHORE LAW FIRM LLP**

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Pursuant to Local Rule AT-3, attorneys for Plaintiff Videoshare, LLC (“VideoShare”), Michael W. Shore, Halima Shukri Ndai and The Shore Law Firm LLP move to withdraw as counsel for VideoShare in the above-captioned civil matter and, in support of this Motion, states as follows:

VideoShare, Gad Ligerant, Mr. Shore, Ms. Ndai and The Shore Firm (collectively the “Movants”) agree and stipulate that Mr. Shore, Ms. Ndai and The Shore Firm (collectively “Attorneys”) have just cause to withdraw from the representation of VideoShare in this matter. The Movants further agree and stipulate that the just cause for the Attorneys to withdraw from the representation of VideoShare and Mr. Ligerant in this matter arose and existed before March 1, 2024.

Movants certify that VideoShare will continue to be represented in this matter by Mark Siegmund and the attorneys at CHERRY JOHNSON SIEGMUND JAMES, PLLC who have or will enter appearances on VideoShare’s behalf.

Counsel for VideoShare conferred with counsel for Defendants Google LLC and YouTube, LLC, who confirmed that this motion is unopposed.

WHEREFORE, PREMISES CONSIDERED, Movants request the Court grant the foregoing Motion for Withdrawal, enter the agreed form of Order attached and terminate the appearances of Michael W. Shore, Halima Shukri Ndai and The Shore Firm in this case for all purposes.

Dated: April 3, 2024

By: /s/ Michael W. Shore

Charles L. Ainsworth (Texas 00783521)  
Robert C. Bunt (Texas 00787165)  
PARKER, BUNT & AINSWORTH P.C.  
100 E. Ferguson Suite 418  
Tyler, Texas 75702  
Tel: (903) 531-3535  
[charley@pbatyler.com](mailto:charley@pbatyler.com)  
[rcbunt@pbatyler.com](mailto:rcbunt@pbatyler.com)

Michael W. Shore (Texas 18294915)  
Halima Shukri Ndai (Texas 24105486)  
THE SHORE FIRM  
901 Main Street, Suite 3300  
Dallas, Texas 75202  
Tel: (214) 593-9110  
Fax: (214) 593-9111  
[mshore@shorefirm.com](mailto:mshore@shorefirm.com)  
[hndai@shorefirm.com](mailto:hndai@shorefirm.com)

  
Gad Liwerant

/s/ Mark Siegmund

Mark Siegmund  
Cherry Johnson Siegmund James  
The Roosevelt Tower  
400 Austin Avenue, 9<sup>th</sup> floor  
Waco, TX 76701  
Tel: (254) 732-2242  
[msiegmund@cjsjlaw.com](mailto:msiegmund@cjsjlaw.com)

**CERTIFICATE OF CONFERENCE**

On March 28, 2024, I conferred with Luann Simmons, attorney for Google LLC regarding Plaintiff's STIPULATED MOTION TO WITHDRAW FOR JUST CAUSE BY MICHAEL SHORE, AND HALIMA SHUKRI NDAI AND THE SHORE LAW FIRM LLP, and counsel is unopposed to the filing of said Motion.

*/s/ Michael W. Shore*  
Michael W. Shore

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that on April 3, 2024, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

*/s/ Michael W. Shore*  
Michael W. Shore